

OSBORN LAW P.C.

Daniel A. Osborn, Esq.
Lindsay M. Trust, Esq.

dosborn@osbornlawpc.com
ltrust@osbornlawpc.com

January 4, 2024

MEMORANDUM ENDORSED

VIA ECF

Honorable Gabriel W. Gorenstein
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *Prosa v. Commissioner of Social Security*
Civil Action No. 1:23-cv-08852-GWG

Dear Judge Gorenstein,

We write on behalf of our client, Nicole M. Prosa, with the consent of the defense, to request additional time to file her motion for judgment on the pleadings which is currently due on January 10, 2024, per the Court's December 12, 2023 Scheduling Order. This is the parties' first request for an extension. The reason for this request is that Plaintiff's counsel currently has fifteen Social Security briefs due in the next two weeks.

After conferring with the defendant, the parties have agreed to proceed according to the following amended scheduling order, subject to the Court's approval:

- Plaintiff to file her motion for judgment on the pleadings on or before: **March 11, 2024**;
- Defendant to file its response to plaintiff's motion/cross motion on or before: **May 10, 2024**; and
- Plaintiff to file her reply, if any, on or before: **May 24, 2024**.

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Thank you for your consideration of this request.

Respectfully submitted,

s/Daniel A. Osborn

Daniel A. Osborn
OSBORN LAW, P.C.
43 West 43rd Street, Suite 131
New York, New York 10036
Telephone: 212-725-9800
Facsimile: 212-500-5115
dosborn@osbornlawpc.com

cc: Jonathan King, Esq. (by ECF)

The proposed schedule is approved. In light of the lengthy periods involved, the parties should not expect that any further extensions will be granted.

So Ordered.


GABRIEL W. GORENSTEIN
United States Magistrate Judge

January 5, 2024